

ORIGINAL

ORIGINAL

DICKSTEIN SHAPIRO MORIN & OSHINSKY LLP

2101 L Street NW • Washington, DC 20037-1526

Tel (202) 785-9700 • Fax (202) 887-0689

Writer's Direct Dial: (202) 828-2226

A1062

EX PARTE OR LATE FILED

RECEIVED

JAN 19 2001

January 19, 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

HAND DELIVERY

Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th Street, SW
Washington, DC 20554

**NOTICE OF WRITTEN
EX PARTE**

Re: CC Docket No. 96-98/Restriction in Availability of Unbundled Switching

Dear Ms. Salas:

This letter reports a written ex parte contact by Rodney Page, Vice President, Marketing & Strategic Development of Access Integrated Networks with Dorothy Attwood clarifying Access' position in the above-referenced docket. Enclosed are two copies of the letter sent to Dorothy Attwood.

If you have any questions, please do not hesitate to give me a call.

Sincerely,



Albert H. Kramer

AHK/rw

cc: Ms. Dorothy Attwood

No. of Copies rec'd 0+1
List A B C D E

RECEIVED

JAN 19 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Toll Free 888-275-0777

Tel. 912-475-9800

Fax. 912-475-9988

www.accesscomm.com



January 19, 2001

Suite 202

4885 Riverside Drive

Macon, GA 31210

Dorothy Attwood
Chief – Common Carrier Bureau
Federal Communications Commission
445 12th Street, SW
Room 5-A848
Washington, DC 20554

Re: CC Docket 96-98; Restriction in Availability of Unbundled Switching

Dear Ms. Attwood:

Access Integrated Networks, Inc. (“Access”) is an unbundled network element platform (“UNE-P”) based competitive local exchange carrier (“CLEC”) providing service throughout the BellSouth region. Using UNE-P, Access has been able to build a customer base with over 40,000 access lines, with over 35,000 added in the last 18 months. Access is currently adding some 3,000-5,000 access lines per month.

Unlike many CLECs who focus on downtown business districts, Access provides service throughout the markets it serves. Enclosed is a list of over 700 cities/towns throughout the nine-state BellSouth operating region in which Access serves customers. The list makes clear that Access provides service in secondary and tertiary markets as well as the major markets.

Access is only able to serve the customers and markets that it does because of the availability of UNE-P. UNE-P allows a CLEC to serve a customer regardless of whether the customer is located in the urban core of a major market. Unlike self-provisioned switching, which requires a concentration of potential customers sufficient to warrant installation of a switch, UNE-P can be used wherever there is a customer desiring competitive service. This means that competition and its attendant benefits are available to all consumers, not merely larger businesses who happen to be located within a loop’s-length of a facilities-based CLEC’s switch or, equally important, whose use of telecommunications is intense enough to make it efficient for service to be provisioned using DS-1 facilities.¹ Access believes that, as a result of the UNE-P line cap currently in effect in density zone 1 of the top 50 MSAs, there is a sizable segment of the market that is currently being directly denied the benefits of competition because it is not in either of the latter two categories. But the direct effects of the line cap do not end there; there is a

¹ As other commenters in this proceeding have demonstrated, even where the installation of a switch is warranted, it is not economical to use self-provisioned switching unless the customer in question is large enough to warrant a DS-1 facility.

direct effect on many of the very mass market consumers the Commission explicitly intended to be direct beneficiaries of its current UNE-P policies –mass market users of telecommunications services in secondary and tertiary markets and users of three lines or less in density zone 1 in the top 50 MSAs.

The class of customers directly denied the benefits of competition by the current UNE-P line cap restriction are those mass market customers who need more than three conventional business lines but whose needs are not sufficient to make it efficient to serve them through a DS1 level loop.² Other parties to this proceeding have demonstrated that the cross-over point, i.e., the point at which it becomes possible for a CLEC using self-supplied switching efficiently to serve these customers, is somewhere in the 16-18 conventional business lines range.³ Access concurs in the analysis and evidence submitted by those parties. That analysis and evidence demonstrate that the Commission should raise the UNE-P line cap to at least 16 lines.

Unless the Commission does so, it is effectively creating a “competition dead zone.” Caught in the dead zone are those millions of small to medium sized business whose business lines needs are somewhere between three and sixteen (or so) lines –with no competitive options. These small business users would benefit immediately and directly from Commission action.

While the boundaries of the “competition dead zone” would seem to be clearly demarcated at the 3 line level (the current line cap in density zone 1 in the top 50 MSAs), in fact the existence of the competition dead zone is having a direct effect on another market segment: the adjacent “low end” of the mass market in the top 50 MSAs –the mass market that the Commission’s rules explicitly intended to protect, the market at the 1-3 line level. The experience of Access in these markets illustrates why.

The three line cap is in effect in the eight BellSouth markets that are in the top 50 MSAs. Access would like to provide service in these markets within the density zone 1, but it is simply not efficient to do so. First, search costs and related operational/marketing costs and discontinuities make it prohibitively expensive to do so. There is no way to know with certainty which customers to target, or otherwise to efficiently market to customers that have 3 lines or less. A sales agent cannot efficiently “pound on doors,” or cover a block, and go into each business to qualify the customer before making a sales presentation. “Cold calling” telemarketing, which in any event is not used by Access, is not cost effective in this context, and obtaining pre-qualified lists is also too costly.

Even if it were possible cost effectively to find the mass market customers, and convert them into a CLEC customer, the serving CLEC then must live in mortal fear of what the typical service provider wants most: for the service provider’s customers to

² See note 1.

³ See e.g., *Petition for Reconsideration* filed by Birch Telecommunications, Inc., CC Dkt. No. 96-98 (April 3, 2000) at 8-11; Letter to Dorothy Attwood from Robert Quinn, filed in CC Dkt. No. 96-98 (October 11, 2000)

demand more service. If the end user grows “too big,” all the way to *four* lines, the CLEC could be forced to give up the customer because the cost of providing service becomes too great. As explained above, converting the customer to self-supplied switching and an unbundled loop cannot be done economically. Nor can the customer any longer be serviced by UNE-P lines. If the customer wants a fourth line, the ILEC is not obligated to provide it, so a UNE-P CLEC may no longer be able to provide service. Even where the ILEC is willing to provide additional UNE-P lines above the line cap, the existence of the line cap makes it possible for the ILEC effectively to preclude the offering of UNE-P by charging exorbitant rates for any UNE-P line above the three line cap. A customer in New Orleans is illustrative. A UNE-P port in New Orleans that is subject to the Commission’s *Remand Order* sells for a monthly rate of \$2.55 to the CLEC. As a result of the line-cap restriction in the top 50 markets, BellSouth is able to charge its so-called “market rate” of \$14.00/month for a fourth UNE-P line in downtown New Orleans, as opposed to the UNE-P price of \$2.55. The exorbitant rates charged by BellSouth in the restricted areas effectively precludes the offering of UNE-P in those areas.

The net effect of these market dynamics is to discourage a CLEC providing service through UNE-P in these top 50 markets in BellSouth territory from offering service to businesses that are at the cap, *i.e.*, three lines. If the customer needs a fourth line before the CLEC offering UNE-P has had an opportunity to amortize and recover the CLEC’s search costs; sales costs; ordering, processing, and cut-over costs; etc., much less contribute to overheads, the customer could be a net cash drain. Customers “at the cap” are high risk customers. Thus, the prudent strategy is to take customers that have some room for growth, *i.e.*, 1 and 2 line customers. But not only does following the prudent strategy further reduce the potential customer base; it also forces concentration of marketing at the levels where any efficiencies in marketing, sales time, etc., as *may* exist are least likely to be found, while at the same time, raising the per line search costs, operations/marketing costs, etc., described above.

The direct effect of restricting UNE-P to the three line and below customers in density zone 1 of the top 50 MSAs is to deprive those customers of the benefits that are of the unbundled switching “carve out,” that is directly targeted to benefit them. It is simply not economically viable to serve those customers in the current circumstances.

The line cap restriction also has a direct effect on another class of targeted beneficiaries of the Commission UNE-P policies, *i.e.*, end users in secondary and tertiary markets. In the *UNE Remand Order*, the Commission recognized that though there may be facilities-based competition in primary markets, there is little or no facilities deployment outside of major markets; nor is there likely to be given the economics of the currently available circuit switches. While facilities-based competition may spread outside of major markets once the next generation of softswitches becomes commercially viable, it is far from clear when this will occur. Even under the most optimistic projections of when the technology will be ready for deployment and of the improvements in margins that softswitches will make possible, it is hard to see effective facilities-based competition spreading to the secondary and tertiary markets in less than two or three years.

If the Commission wishes to bring the benefits of competitive choice to small customers in smaller markets, it is critical that the Commission reduce or eliminate the restriction on the availability of unbundled switching (and thus of UNE-P) in access density zone 1 of the top 50 Metropolitan Statistical Areas ("MSAs"). This is because the ability to serve smaller customers in smaller markets is linked to the ability to serve larger customers in the major markets. Without access to customers with four or more lines in zone 1 of the top 50 MSAs, UNE-P providers are denied access to the densest, highest margin segment of the market. Additionally, not only do UNE-P providers lose access to a key revenue source, they lose the ability to spread their overhead costs over a sufficiently large base of customers to justify market entry. Thus, because ILECs are able to price UNE-P at exorbitant rates within the top 50 markets, if the ILEC makes the UNE-P available at all, the immediate result of the current line cap is to preclude UNE-P providers from entering the top 50 markets. And, in turn, because UNE-P providers are denied access to the top 50 markets, they are denied access to a critical piece of the revenue and customer base necessary to fund expansion in the secondary and tertiary markets. This handicap is real. It has slowed Access's own expansion and has restricted Access from serving markets that it otherwise would.

* * * *

The list of 700 localities served by Access (enclosed with this letter)⁴ is itself testament to the ability of UNE-P to spawn entrants who bring the benefits of competition to the mass market and to secondary markets and the potential of local investment in infrastructure at some future time. At the same time, the effect of the UNE-P line cap restriction has been to create a competitive dead zone in the market segment between the current 3 UNE-P line cap and business users who use conventional lines up to the 16-18 line range, the point at which these users can be efficiently served by DS1 level facilities. Further, the line cap restriction has actually inhibited the arrival of competition for the intended beneficiaries of the Commission's UNE-P policies: users with three lines or less and users in secondary and tertiary markets.

Removing the line cap restriction will ameliorate these unintended consequences. It would directly and immediately bring to the small to medium sized markets —the mass market about which the Commission has repeatedly expressed concern— the benefits of competition. This will ensure that mass market consumers in these areas have the benefit of competition unless and until, and only if, market and/or technological developments otherwise make it possible for these consumers to be served through an equally efficient alternative. The availability of UNE-P thus becomes a competitive safeguard for this segment of the market.

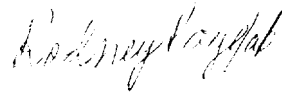
In sum, the Commission must correct its artificial and harmful segmentation of the market. The Commission should expand the availability of UNE-P in access zone 1 of

⁴ A handful of the localities listed may reflect customers who purchase long distance service only from Access or billing addresses rather than service addresses.

Dorothy Attwood
January 19, 2001
Page 5

the top 50 MSAs to allow access to all customers served through individual analog voice lines.

Sincerely,

A handwritten signature in black ink, appearing to read "Rodney Page".

Rodney Page
*Vice President - Marketing & Strategic
Planning*

AHK/rw
Enclosure

cc: Mr. Jonathan Reel
Ms. Anna Gomez
Ms. Rebecca Beynon
Mr. Jordan Goldstein
Mr. Kyle Dixon
Ms. Deena Shetler

City	State
ADAMSVILLE	AL
ADDISON	AL
ALABASTER	AL
ALBERTVILLE	AL
ALEXANDER CITY	AL
ANNISTON	AL
ARLEY	AL
ATHENS	AL
AUBURN	AL
BAY MINETTE	AL
BESSEMER	AL
BIRMINGHAM	AL
BLUFF PARK	AL
BREWTON	AL
CALERA	AL
CALLMAN	AL
CENTREVILLE	AL
CHELSEA	AL
CHILDERSBURG	AL
CITRONEL	AL
CLANTON	AL
CLAYTON	AL
COLUMBIA	AL
COLUMBIANA	AL
COURTLAND	AL
CRANE HILL	AL
CULLMAN	AL
DANVILLE	AL
DAPHNE	AL
DECATUR	AL
DEMOPOLIS	AL
DORA	AL
DOUBLE SPRINGS	AL
E GADSDEN	AL
EASTABOGA	AL
EUFAULA	AL
EUTAW	AL
EVA	AL
FAIRFIELD	AL
FAIRHOPE	AL
FALKVILLE	AL
FLORENCE	AL
FORESTDALE	AL
FORSYTH	AL
FT PAYNE	AL
FULTONDALE	AL
GADSDEN	AL
GADSON	AL
GARDENDALE	AL
GRAYSVILLE	AL
GREENSBORO	AL
GURLEY	AL
HANCEVILLE	AL
HARPERSVILLE	AL

HARTSELLE	AL
HARTSVILLE	AL
HAZEL GREEN	AL
HELENA	AL
HOLLY POND	AL
HOMEWOOD	AL
HOOVER	AL
HUEYTOWN	AL
HUNTSVILLE	AL
IRONDALE	AL
JACKSON	AL
JACKSONVILLE	AL
JASPER	AL
KILLEN	AL
LAFAYETTE	AL
LEEDS	AL
LEIGHTON	AL
MADISON	AL
MCCALLA	AL
MERIDIANVILLE	AL
MOBILE	AL
MONGOMERY	AL
MONTEVALLO	AL
MONTGOMERY	AL
MOORESVILLE	AL
MOULTON	AL
MOUNTAIN BROOK	AL
MUNFORD	AL
MUSCLE SHOALS	AL
NORTH PORT	AL
OPELIKA	AL
ROADS	AL
OXFORD	AL
PELHAM	AL
PHENIX CITY	AL
PINSON	AL
PLEASANT GROVE	AL
PRATTVILLE	AL
RAINBOW CITY	AL
RED BAY	AL
REMLAP	AL
ROGERSVILLE	AL
RUSSELLVILLE	AL
SARALAND	AL
SELMA	AL
SHEFFIELD	AL
SMITHS	AL
SPANISH FT.	AL
SPRUCE PINES	AL
SUMITON	AL
SYLACAUGA	AL
TALLADEGA	AL
TARRANT	AL
THEODORE	AL
TOWNCREEK	AL

TRINITY	AL
TROY	AL
TRUSSVILLE	AL
TULLAHOMA	AL
TUSCALOOSA	AL
TUSCUMBIA	AL
TUSKEGEE	AL
VANDIVER	AL
VESTAVIA	AL
VESTAVIA HILLS	AL
VINA	AL
VINCENT	AL
VINEMONT	AL
WARRIOR	AL
WETUMPKA	AL
WILSONVILLE	AL
AMELIA ISLAND	FL
ATLANTIC BEACH	FL
BLOUNTSTOWN	FL
BOCA RATON	FL
BOYNTON BEACH	FL
CAPE CANARERAL	FL
CAROL CITY	FL
CHIEFLAND	FL
COCOA	FL
COCOA BEACH	FL
DAVIE	FL
DAYTONA BEACH	FL
BEACH	FL
DELRAY BEACH	FL
DELTONA	FL
EAST PALATKA	FL
EDGEWATER	FL
LAUDERDALE	FL
FORT PIERCE	FL
FT LADERDALE	FL
GAINESVILLE	FL
GREENACRES	FL
GULF BREEZE	FL
HALLANDALE	FL
HOBE SOUND	FL
HOLLYWOOD	FL
HOMESTEAD	FL
JACKSONVILLE	FL
JUPITER	FL
LAKE CITY	FL
LAKELAND	FL
LAUDERHILL	FL
LONGWOOD	FL
MARGATE	FL
MEDLY	FL
MELBOURNE	FL
MERRITT ISLAND	FL

MIAMI	FL
MIAMI BEACH	FL
MIRAMAR	FL
N LAUDERDALE	FL
N MIAMI	FL
N. MIAMI	FL
LAUDERDALE	FL
NORTH MIAMI	FL
OAKLAND	FL
OAKLAND PARK	FL
OCOE	FL
OPA LOCKA	FL
ORANGE PARK	FL
ORLANDO	FL
ORMOND BEACH	FL
OVIEDO	FL
PALATKA	FL
PALM BAY	FL
PALM BEACH	FL
PANAMA CITY	FL
PANAMA CITY BCH	FL
PEMBROKE PINES	FL
PENSACOLA	FL
PLANTATION	FL
POMPANO BEACH	FL
PORT ORANGE	FL
PORT ORANGE	FL
PORT SALERNO	FL
PORT ST JOHN	FL
PORT ST LUCE	FL
ROCKLEDGE	FL
SAINT AUGUSTINE	FL
SANFORD	FL
SANFORD	FL
SATELLITE BEACH	FL
SEBASTIAN	FL
SOUTH DAYTONA	FL
STUART	FL
SUNRISE	FL
TAMARAC	FL
TITUSVILLE	FL
VERO BEACH	FL
W MELBOURNE	FL
WELLINGTON	FL
WEST PALM BCH	FL
WINTER HAVEN	FL
ACWORTH	GA
ADAIRSVILLE	GA
ADEL	GA
ALBANY	GA
ALPHARETTA	GA
AMERICUS	GA
ANDERSONVILLE	GA

ARABI	GA
ARLINGTON	GA
ASHBURN	GA
ATHENS	GA
ATLANTA	GA
AUBURN	GA
AUGUSTA	GA
AUSTELL	GA
BACONTON	GA
BAINBRIDGE	GA
BARNESVILLE	GA
BARTLETT	GA
BAXLEY	GA
BERKELEY LAKE	GA
BISHOP	GA
BLAKELY	GA
BLOOMINGDALE	GA
BOGART	GA
BOLINGBROKE	GA
BONAIRE	GA
BOWDEN	GA
JUNCTION	GA
BREMEN	GA
BREWTON	GA
BRIDGEBORO	GA
BRUNSWICK	GA
BUCHANAN	GA
BUCKHEAD	GA
BUENA VISTA	GA
BUFORD	GA
CAMILLA	GA
CANTON	GA
CARROLLTON	GA
CARTERSVILLE	GA
CARTERSVILLE	GA
CARTHAGE	GA
CEDARTOWN	GA
CEDARTOWN	GA
CHAMBLEE	GA
CLAXTON	GA
CLERMONT	GA
CLEVELAND	GA
COCHRAN	GA
COLLEGE PARK	GA
COLQUITT	GA
COLUMBUS	GA
CONYERS	GA
CORDELE	GA
COVINGTON	GA
CRAWFORD	GA
CUMMING	GA
CUTHBERT	GA
DACULA	GA
DALLAS	GA
DECATUR	GA

DEXTER	GA
DOERUN	GA
VILLE	GA
DORAVILLE	GA
DOUGLASVILLE	GA
DUBLIN	GA
DULUTH	GA
DUNWOODY	GA
EAST DUBLIN	GA
EAST POINT	GA
EASTMAN	GA
EATONTON	GA
EATONTON	GA
ELBERTON	GA
ELLAVILLE	GA
ELLENWOOD	GA
EMERSON	GA
EVANS	GA
FAIRBURN	GA
FAYETTEVILLE	GA
FITZGERALD	GA
FOREST PARK	GA
FORSTYH	GA
OGLETHORPE	GA
FORT VALLEY	GA
FORTSON	GA
GAINESVILLE	GA
GARDEN CITY	GA
GREENSBORO	GA
GRIFFIN	GA
HAMILTON	GA
HAMPTON	GA
HAPEVILLE	GA
HARLEM	GA
HARTWELL	GA
HAWKINSVILLE	GA
HINESVILLE	GA
HIRAM	GA
HULL	GA
JACKSON	GA
JEFFERSON	GA
JEKYLL ISLAND	GA
JESUP	GA
JONESBORO	GA
JULIETTE	GA
KATHLEEN	GA
KINGSLAND	GA
KINGSTON	GA
LAGRANGE	GA
LAKE CITY	GA
LAKE PARK	GA
LAVONIA	GA
LAWRENCEVILLE	GA
LEARY	GA
LEESBURG	GA

LILBURN	GA
LITHIA SPRINGS	GA
LITHONIA	GA
LOCUST GROVE	GA
LOGANVILLE	GA
LOUISVILLE	GA
LUMPKIN	GA
LUTHERSVILLE	GA
LYONS	GA
MABLETON	GA
MACON	GA
MADISON	GA
MANSFIELD	GA
MARIETTA	GA
MARTINEZ	GA
MCDONOUGH	GA
MEANSVILLE	GA
MIDLAND	GA
MILNER	GA
MONTICELLO	GA
MORGAN	GA
MORROW	GA
MOUNT VERNON	GA
MOUNTAIN PARK	GA
MURRAYVILLE	GA
MUSELLA	GA
NEWBORN	GA
NEWMAN	GA
NORCROSS	GA
OAKWOOD	GA
OCILLA	GA
OCONEE	GA
OGLETHORPE	GA
OXFORD	GA
PALMETTO	GA
PEACHTREE CITY	GA
PELHAM	GA
PINE MOUNTAIN	GA
PITTS	GA
POOLER	GA
WENTWORTH	GA
SPRINGS	GA
SPRINGS	GA
PT WENTWORTH	GA
REYNOLDS	GA
RICHLAND	GA
RICHMOND HILL	GA
RINCON	GA
RINGGOLD	GA
RIVERDALE	GA
ROBERTA	GA
ROCKLEDGE	GA
ROCKMART	GA
ROCKY FACE	GA
ROME	GA

ROSSVILLE	GA
ROSWELL	GA
ROYSTON	GA
RYDALE	GA
SANDERSVILLE	GA
SAVANNAH	GA
SHADY DALE	GA
SHARPSBURG	GA
SILLOAM	GA
SMARR	GA
SMITHVILLE	GA
SMRYNA	GA
SNELLVILLE	GA
SOCIAL CIRCLE	GA
SPARTA	GA
ISLAND	GA
STATESBORO	GA
STATHAM	GA
STOCKBRIDGE	GA
STONE MOUNTAIN	GA
STONEBRIDGE	GA
SUGAR HILL	GA
SUMMERVILLE	GA
SUWANEE	GA
SWAINSBORO	GA
SYLVESTER	GA
TALLAPOOSA	GA
TENNILLE	GA
THOMASTON	GA
THOMASVILLE	GA
THOMSON	GA
THUNDERBOLT	GA
TIFTON	GA
TOCCOA	GA
TRION	GA
TUCKER	GA
TY TY	GA
TYBEE ISLAND	GA
TYRONE	GA
UNION CITY	GA
VALDOSTA	GA
VIDALIA	GA
VILLA RICA	GA
WADLEY	GA
WARNER ROBBINS	GA
WARRENTON	GA
WASHINGTON	GA
WATKINSVILLE	GA
WAYCROSS	GA
WAYNESBORO	GA
WHITESBURG	GA
WINDER	GA
WOODSTOCK	GA
WRENS	GA
WRIGHTSVILLE	GA

ZEBULON	GA
BOWLING GREEN	KY
CENTRAL CITY	KY
CORBIN	KY
DANVILLE	KY
ELKTON	KY
FRANKFORT	KY
FRANKLIN	KY
FULTON	KY
GREENVILLE	KY
HAZARD	KY
HENDERSON	KY
HOPKINSVILLE	KY
LAGRANGE	KY
LEXINGTON	KY
LOUISVILLE	KY
MADISONVILLE	KY
MAYFIELD	KY
MOREHEAD	KY
MORGANTOWN	KY
OWENSBORO	KY
PADUCAH	KY
PAINTSVILLE	KY
PIKEVILLE	KY
RUSSELLVILLE	KY
S WILLIAMSON	KY
SHELBYVILLE	KY
WILLIAMSON	KY
WINCHESTER	KY
BASTROP	LA
DERIDDER	LA
HAMMOND	LA
MANDELVILLE	LA
MONROE	LA
NEW ORLEANS	LA
RUSTON	LA
VIDALIA	LA
BATESVILLE	MS
BILOXI	MS
BRANDON	MS
BROOKHAVEN	MS
CALEDONIA	MS
CARTHAGE	MS
CHARLESTON	MS
CLARKSDALE	MS
CLEVELAND	MS
COLLINSVILLE	MS
COLUMBUS	MS
CORINTH	MS

D'IBERVILLE	MS
DURANT	MS
EDINBURG	MS
ELLIOTT	MS
ETHEL	MS
FOREST	MS
GAUTIER	MS
GREENVILLE	MS
GREENWOOD	MS
GRENADA	MS
GULFPORT	MS
HATTIESBURG	MS
HERNANDO	MS
HICKORY	MS
HORNLAKE	MS
JACKSON	MS
KILMICHAEL	MS
KOSCIUSKO	MS
LAKE	MS
LAMAR	MS
LAUREL	MS
LENA	MS
LOUISVILLE	MS
LUCEDALE	MS
MACON	MS
MARKS	MS
MCCOMB	MS
MERIDIAN	MS
MOSS POINT	MS
NATCHEZ	MS
NESBIT	MS
NEW ALBANY	MS
NEWTON	MS
OBADIAH	MS
OCEAN SPRINGS	MS
OLIVE BRANCH	MS
OXFORD	MS
PASCAGOULA	MS
PEARL	MS
PHILADELPHIA	MS
QUITMAN	MS
RIDGELAND	MS
ROBINSONVILLE	MS
SARAH	MS
SENATOBIA	MS
SHUQUALAK	MS
SOUTHAVER	MS
STARKSVILLE	MS
TAYLORSVILLE	MS
TUNICA	MS
TUPELO	MS
UNION	MS
VANCELEAVE	MS
VICKSBURG	MS
WALLS	MS

WALNUT GROVE	MS
WINONA	MS
ARDEN	NC
ASHEVILLE	NC
BOILING SPRINGS	NC
BOONE	NC
CARY	NC
CASHIER	NC
CHARLOTTE	NC
CONCORD	NC
CORNELIUS	NC
EAST SPENCER	NC
FOREST CITY	NC
GARNER	NC
GASTONIA	NC
GOLDSBORO	NC
GREENSBORO	NC
HAMLET	NC
HENDERSONVILLE	NC
HIGHPOINT	NC
KINGS MOUNTAIN	NC
LAURINBURG	NC
LENOIR	NC
LUMBERTON	NC
MOORESVILLE	NC
MORGANTON	NC
PEMBROKE	NC
PINEVILLE	NC
RALEIGH	NC
REIDSVILLE	NC
ROCKINGHAM	NC
SALISBURY	NC
SHELBY	NC
STATESVILLE	NC
WAYNESVILLE	NC
WILSON	NC
AIKEN	SC
ANDERSON	SC
BATESBURG	SC
BENNETTSTVILLE	SC
BLUFFTON	SC
BLYTHEWOOD	SC
BOILING SPRINGS	SC
CAMDEN	SC
CHANGE	SC
CHARLESTON	SC
CHASNEE	SC
CHERAW	SC
CHESNEE	SC
CLEMSON	SC
CLOVER	SC

COLUMBIA	SC
DARLINGTON	SC
DILLION	SC
DUNCAN	SC
EASLEY	SC
FLORENCE	SC
GAFFNEY	SC
GREENVILLE	SC
GREER	SC
HARTSVILLE	SC
HICKORY GROVE	SC
INMAN	SC
IRMO	SC
LADSON	SC
LEXINGTON	SC
LIBERTY	SC
LITTLE RIVER	SC
MARIETTA	SC
MARION	SC
MAULDIN	SC
MOORE	SC
MT PLEASANT	SC
MT PLEASANT	SC
MULLINS	SC
N AUGUSTA	SC
N AUGUSTA	SC
N CHARLESTON	SC
N MYRTLE BEACH	SC
ORANGEBURG	SC
PELZER	SC
PENDLETON	SC
PICKENS	SC
PIEDMONT	SC
POWDERSVILLE	SC
REIDVILLE	SC
ROCK HILL	SC
ROEBUCK	SC
SENECA	SC
SPARTANBURG	SC
SUMMERVILLE	SC
TAYLOR	SC
TRAVELERS REST	SC
W COLUMBIA	SC
WALHALLA	SC
WELLFORD	SC
WEST COLUMBIA	SC
WEST UNION	SC
WESTMINISTER	SC
WILLIAMSTON	SC
YORK	SC
ALCOA	TN
ANTIOCH	TN
ARLINGTON	TN

ATHENS	TN
BARTLETT	TN
BOLIVAR	TN
BRENTWOOD	TN
BRISTOL	TN
BROWNSVILLE	TN
CHATANOOGA	TN
CLARKSVILLE	TN
CLEVELAND	TN
COLLEGEDALE	TN
COLLERVILLE	TN
COLUMBIA	TN
COLUMBUS	TN
CORDORA	TN
COVINGTON	TN
DAYTON	TN
DUCKTOWN	TN
DYERSBURG	TN
EADS	TN
EAST RIDGE	TN
ELIZABETHTON	TN
FAYETTEVILLE	TN
FRANKLIN	TN
GALLATIN	TN
GATLINBURG	TN
GERMANTOWN	TN
GRAND JUNCTION	TN
GREENBRIER	TN
HAMPSHIRE	TN
HENDERSON	TN
HENDERSONVILLE	TN
HIXSON	TN
HIXSON PIKE	TN
HUMBOLDT	TN
HUNTINGDON	TN
JACKSBORO	TN
JACKSON	TN
JASPER	TN
JEFFERSON CITY	TN
JOHNSON CITY	TN
JONESBOROUGH	TN
KIMBALL	TN
KINGSPORT	TN
KNOXVILLE	TN
LAFOLLETTE	TN
LAKE LAND	TN
LEBANON	TN
LENOIR CITY	TN
LEWISBURG	TN
LEXINGTON	TN
LOUISVILLE	TN
LYNNVILLE	TN
MADISON	TN
MADISONVILLE	TN
MANCHESTER	TN

